

Theodore A. Griffinger, Jr. (SBN 66028)
Tanya Herrera (SBN 177790)
STEIN & LUBIN LLP
Transamerica Pyramid
600 Montgomery Street, 14th Floor
San Francisco, CA 94111
Telephone: (415) 981-0550
Facsimile: (415) 981-4343
tgriffinger@steinlubin.com
therrera@steinlubin.com

Attorneys for Defendants,
JON SABES, STEVEN SABES AND MARVIN
SIEGEL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SUZANNE D. JACKSON,

Plaintiff,

v.

WILLIAM FISCHER; JON SABES;
STEVEN SABES; DAVID GOLDSTEEN;
MARVIN SIEGEL; BRIAN CAMPION;
LONNIE BROOKBINDER; CHETAN
NARSUDE; MANI KOOLASURIYA;
JOSHUA ROSEN; UPPER ORBIT, LLC;
SPECIGEN, INC.; PEER DREAMS INC.;
NOTEBOOKZ INC.; ILEONARDO.COM
INC.; NEW MOON LLC; MONVIA LLC;
and SAZANI BEACH HOTEL,

Defendants.

Case No. 3:11-cv-02753-JSW

**STIPULATION AND ~~PROPOSED~~
ORDER GRANTING LEAVE TO EXCEED
PAGE LIMITS ESTABLISHED BY THE
COURT'S CIVIL STANDING ORDERS**

Plaintiff Suzanne Jackson and Defendants Jon Sabes, Steven Sabes and Marvin
Siegel (collectively "Defendants"), by and through their counsel, and subject to the Court's
approval, stipulate as follows:

WHEREAS, Plaintiff filed a First Amended Complaint ("FAC") on December 5,
2011;

WHEREAS, the FAC asserts purported federal securities fraud and common law

1 claims related to Plaintiffs' investments;

2 **WHEREAS**, the FAC alleges, *inter alia*, that Defendants engaged in a
3 comprehensive scheme to defraud Plaintiff in violation of the Securities Exchange Act of 1934
4 and the Securities Act of 1933 and by failing to provide and failing to disclose material facts,
5 which purportedly constitute common law fraud;

6 **WHEREAS**, the parties agree that the FAC's scope and complexity warrant a
7 modest increase in the page limits imposed by this Court's Civil Standing Orders for Defendants'
8 opening brief and Plaintiff's opposition brief to Defendants' motion to dismiss, but that the page
9 limit for Defendants' reply brief shall remain 15 pages;

10 **NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY**
11 **AND BETWEEN THE PARTIES**, subject to the Court's approval, that:

12 1. Defendants' memorandum of law in support of their motion to dismiss shall
13 not exceed 25 pages; and

14 2. Plaintiffs memorandum of law in opposition to Defendants' motion to
15 dismiss shall not exceed 25 pages.

16 Dated: January 6, 2011

KAUFMAN LLC

17
18 By: /s/ Alan H. Kaufman

Alan H. Kaufman

19 Attorneys for Plaintiff Suzanne D. Jackson

20 Dated: January 6, 2011

STEIN & LUBIN LLP

21
22 By: /s/ Tanya Herrera

Tanya Herrera

23 Attorneys for Defendants

24 Jon Sabes, Steven Sabes and Marvin Siegel

PROPOSED ORDER

Having reviewed the above stipulation, **IT IS HEREBY ORDERED** that the page limits for the motion to dismiss briefing in this matter shall be:

Defendants' motion to dismiss: 25 pages

Plaintiff's opposition to Defendants' motion to dismiss: 25 pages

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

Dated: January 11, 2012


The Honorable Jeffrey S. White
United States District Judge

By: CHIEF JUDGE JAMES WARE